

April 8, 2011

Ms. Sharon Fang, P.E.  
Remedial Project Manager (3HS21)  
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Re: Metal Bank Cottman Avenue NPL Site  
Monthly Report due April 10, 2011  
Reporting Period: March 1 through March 31, 2010

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,  
ARCADIS US, INC.



Wyn V. Davies, CIH  
Associate Vice President  
Principal Environmental Remediation Specialist

Cc: Cottman Avenue PRP Group  
Steering and Technical Committees  
Joseph Vitale, P.E.  
Raymond E. Lees, P.E., CHMM  
Dan J. Jordanger, Esquire

Enclosures  
3809013



Project Name: Metal Bank NPL Site	For the Month: March 2011	
Project Location: Philadelphia, PA	Report Number: 60	Dated: April 8, 2011

Name: Wyn Davies (ARCADIS)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817

Reporting Period: March 1 through March 31, 2011

**(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:**

Remedial action monitoring continued throughout the month of March 2011. Activities included the following:

- Completed interpretation of the survey data for the upland cap topography, the marine mattress locations and near shore mudflat bathymetry
- Post storm event inspection per LTM requirements on March 11, 2011
- On-site inspection with the S&E repair contractor on March 17, 2011
- Selection of the contractor/vendor for the caged worm study
- Tentative identification of contractor (s)/vendor(s) for the fish tissue study
- Maintained soil erosion & sedimentation control aspects
- Provided access to the site for the US EPA to monitor the work related to the LTM

**(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:**

None

**(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:**

- Cottman Ave PRP Group to EPA – The Group provided notice to the EPA that the SECOND ROUND groundwater validation report was received and will be transmitted to EPA by March 3, 2011. (3/1/11)
- EPA to Cottman Ave PRP Group – The EPA provided the Philadelphia Water Department inspection report to the Group regarding the inspection results determined by Erosion and Sediment Control Officer visit of February 23, 2011 (3/1/11)
- Cottman Ave PRP Group to EPA – The Group provided the EPA, PaDEP, NJDEP, DRBC, and EPA's contractor the SECOND ROUND groundwater validation report in electronic format for their use. (3/3/11)
- Cottman Ave PRP Group to EPA – The Group provided an electronic letter report and certified drawings to the EPA regarding the results of the LTM upland survey, marine

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mattress placement verification, sub-aqueous cap, and bathymetry performed in December 2010 (3/9/11)

- Cottman Ave PRP Group to EPA – The Group provided paper certified drawings to the EPA regarding the results of the LTM upland survey, marine mattress placement verification, sub-aqueous cap, and bathymetry performed in December 2010 (3/10/11)
- EPA to Cottman Ave PRP Group – The EPA requested that the Group provide the EPA documentation regarding the final disbursement request (December 16, 2009) from the EPA Special Account (3/11/11)
- Cottman Ave PRP Group to EPA – The Group provided the EPA the final disbursement request (December 16, 2009) from the EPA Special Account (3/11/11)
- Cottman Ave PRP Group to EPA – The Group provided notice to the EPA that the FOURTH ROUND groundwater sampling event will commence on April 11, 2011 and be approximately a 3 day duration event. (3/14/11)
- EPA to Cottman Ave PRP Group – The EPA provided conditional approval to the Group regarding the Long-term Monitoring Work Plan (WP), Biota Quality Assurance Project Plan (Quapp) Addendum for Fish Sampling, and Field Sampling Plan (FSP) Addendum for Fish Sampling, dated January 2011 (3/14/11)
- EPA to Cottman Ave PRP Group – The EPA provided comments to the Group regarding the Site Remediation Project Engineer's Report (May 2010), sediment and erosion control compliance, and the vegetative cap establishment (3/22/11)
- EPA to Cottman Ave PRP Group – The EPA requested that the Group provide EPA and its contractor (CDM) validated groundwater monitoring data when it is available. (3/28/11)

**(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:**
























The current month look-ahead schedule for LTM O&M is attached.

The PRP Group will continue performing the Long Term Monitoring activities including:

- Manage the data validation report preparation from the third round of groundwater monitoring
- Perform the fourth round of groundwater sampling (April 11)
- Perform the quarterly LNAPL trench inspection (April 13)
- Perform the quarterly site inspection (April 13)
- Selection of the contractor/vendor for the fish tissue study
- Initiate the soil and erosion repairs relative to the March 15<sup>th</sup> inspection
- Maintain the soil & erosion aspects
- Continue monitoring of site for HSE compliance




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<b>(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:</b>		
<ul style="list-style-type: none"> <li>All LTM O&amp;M commitments are on schedule</li> </ul>		
<b>(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:</b>		
<ul style="list-style-type: none"> <li>none</li> </ul>		
<b>(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:</b>		
<ul style="list-style-type: none"> <li>The Group will coordinate with EPA on any community outreach endeavors on an as needed basis through the Long Term Monitoring period.</li> </ul>		

ID	Task Name	Duration	Start	Finish	April					May		
					3/27	4/3	4/10	4/17	4/24	5/1	5/8	5/15
1	 Submittal of Engineer Certification Report	1 day	Fri 5/28/10	Fri 5/28/10								
2	 Submittal of Updates to LTM - Fsh Study QAPP, FSP anf LTM Mods	1 day	Fri 1/7/11	Fri 1/7/11								
3	<b>Commencement of LTM</b>	<b>1129 days</b>	<b>Thu 7/1/10</b>	<b>Tue 10/28/14</b>								
4	 Commencement of LTM	1 day	Thu 7/1/10	Thu 7/1/10								
5	 Groundwater Quarterly Monitoring	399 days	Mon 1/10/11	Thu 7/19/12								
14	 Groundwater Monitoring Annual	268 days	Tue 1/8/13	Thu 1/16/14								
17	 Caged Worm Studies	263 days	Wed 6/1/11	Fri 6/1/12								
20	 Building 7 Assessment and Repair (as Needed)	787 days	Wed 5/4/11	Thu 5/8/14								
25	 Sheet Pile Wall Monitoring	106 days	Tue 12/7/10	Tue 5/3/11								
32	 Sheet Pile Monitoring Quarterly	331 days	Tue 5/3/11	Tue 8/7/12								
39	 LTM Quarterly Inspections and LNAPL Monitoring	981 days	Tue 1/25/11	Tue 10/28/14								
56	 Upland Surveying and Bathymetry	786 days	Mon 7/4/11	Mon 7/7/14								
61	 Diver Assisted Marine Mattress Location Assessment	783 days	Wed 7/6/11	Fri 7/4/14								
66	 Landfill Mowing	787 days	Wed 6/1/11	Thu 6/5/14								
71	<b>Performance of Fish Study</b>	<b>145 days</b>	<b>Tue 2/15/11</b>	<b>Mon 9/5/11</b>								
72	 Receipt of EPA Approval on QAPP and FSP	30 days	Fri 4/8/11	Thu 5/19/11								
73	 Field Implementation Logistics	60 days	Tue 2/15/11	Mon 5/9/11								
74	 Perform Study	10 days	Tue 5/31/11	Mon 6/13/11								
75	Data Interpretation and Reporting	60 days	Tue 6/14/11	Mon 9/5/11								
76	<b>Performance of the 2011 Caged Worm Study</b>	<b>216 days</b>	<b>Mon 1/10/11</b>	<b>Mon 11/7/11</b>								
77	 Resolve Scope of Work	15 days	Mon 1/10/11	Fri 1/28/11								
78	Selection of Contractor	40 days	Mon 1/31/11	Fri 3/25/11								
79	 Field Implementation Logistics	30 days	Mon 4/4/11	Fri 5/13/11								
80	 Perform Study	36 days	Mon 6/6/11	Mon 7/25/11								
81	Data Interpretation and Reporting	75 days	Tue 7/26/11	Mon 11/7/11								
82	 Invasive Species Herbicide Treatment (Emergence)- Milnor St.	2 days	Fri 7/8/11	Mon 7/11/11								
83	 Invasive Species (Knot Weed) Treatment along Delaware River Bank (Emergence)	3 days	Tue 7/5/11	Thu 7/7/11								
84	 Mechanically Eradicate Invasive Plants	2 days	Mon 8/15/11	Tue 8/16/11								
85	 Evaluation of Native Grass Germination	1 day	Wed 6/22/11	Wed 6/22/11								

Project: Metal Bank LTM Schedule 120110  
Date: Mon 4/4/11

Task   
Split   
Milestone 

Summary   
Project Summary   
External Tasks 

External Milestone   
Deadline   
Progress 